

**DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S
MOTION TO COMPEL PLAINTIFF'S DISCOVERY RESPONSES AND PAY COSTS**

EXHIBIT 14

*December 2, 2016 Email from Greg Gorski regarding Mr. Shelton's deposition
being held in King of Prussia*



Re: Shelton - Plaintiff's Father's Deposition Location

Gregory Gorski <ggorski@consumerlawfirm.com> to: John Paul Putney

12/09/2016 05:14 PM

Hi John,

We never agreed on a location for the deposition and to my knowledge you are the only person traveling for this deposition. Moreover, the travel time from Philadelphia's airport to King of Prussia as opposed to downtown Philadelphia would be roughly the same for you. Additionally, there are ample hotels and conference room space in King of Prussia to conduct a deposition and provide lodging for you. Accordingly, the only conclusion I can reach about your reluctance to conduct the deposition of a third-party witness in King of Prussia is that you are intentionally trying to inconvenience Plaintiff's father as a means of harassment. Please reconsider your position and provide a location to conduct the deposition in King of Prussia on Monday.

GG

On Dec 9, 2016, at 4:18 PM, John Paul Putney <jputney@jonesday.com> wrote:

Greg--

Mr. Shelton was first subpoenaed almost four weeks ago for a deposition that was to have taken place almost three weeks ago. We agreed to the date, December 15th, because you proposed it on behalf of your client--the deponent--and at a location not far from his primary residence. I understand that being deposed inevitably entails some disruption to Mr. Shelton's busy schedule, but coming downtown seems fairly reasonable given that Mr. Shelton is not the only person affected and that most of the people participating in the deposition will be traveling much farther than Mr. Shelton.

Thanks,

John Paul Putney

Associate

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JPutney@JonesDay.com

From: Gregory Gorski <ggorski@consumerlawfirm.com>

To: John Paul Putney <jputney@jonesday.com>

Date: 12/08/2016 04:18 PM

Subject: Shelton - Plaintiff's Father's Deposition Location

Hi John,

Since it appears the deposition of Plaintiff's father is going to end up going forward, Mr. Shelton has a busy work schedule and would like the deposition to be conducted in King of Prussia, which I think is reasonable. Can you advise regarding the location you would like to conduct the deposition in or near King of Prussia.

GG

Gregory Gorski, Esquire

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